

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HARRY GAO and ROBERTA SOCALL,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE & CO. and CHASE
BANK USA, N.A.,

Defendants.

Case No. 1:14-cv-04281-PAC

**DECLARATION OF JONATHAN D.
CARAMEROS RE: OPT-OUTS AND
OBJECTIONS**

I, **JONATHAN D. CARAMEROS**, declare:

1. I am a Vice President at Kurtzman Carson Consultants LLC (“KCC”). I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.¹ This declaration supplements the declaration of Eric Robin executed on May 24, 2017.

2. KCC was retained to serve as the Settlement Administrator to, among other tasks, mail the Mail Notice and Claim Form; provide the Long-Form Notice on the Settlement Website; receive and process Claim Forms; respond to Settlement Class Member inquiries; establish and maintain the Settlement Website; and perform other duties as specified in the Settlement Agreement and Release (the “Agreement”) preliminarily approved by this Court by Order dated October 18, 2016, as amended by Order dated October 25, 2016, and the Modification and Supplement to the Agreement (“Modification and Supplement”).

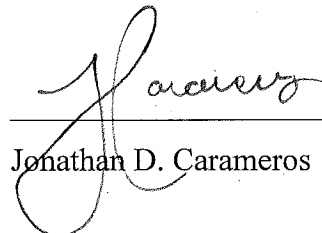
3. **Requests for Exclusion.** The original postmarked deadline for Settlement Class Members to request to be excluded from the Settlement Class was February 15, 2017. The postmarked deadline for Settlement Class Members that were part of the Supplemental Notice Program to request to be excluded from the Settlement Class was June 14, 2017. As of the date of the declaration executed by

¹ The definitions in the Settlement Agreement and Release (“Agreement”), as amended by the Modification and Supplement to the Agreement (“Modification and Supplement”), are hereby incorporated as though fully set forth herein, and capitalized terms shall have the meanings attributed to them in the Agreement, as amended by the Modification and Supplement. See Dkt. Nos. 70-1, 84-1.

Eric Robin on March 22, 2017 (Dkt. No 82), KCC had received seven (7) requests for exclusion, six (6) of which were timely and one (1) of which was untimely. KCC has not received any new requests for exclusion since then. The same list of the Settlement Class Members requesting to be excluded and copies of the exclusion requests previously provided to the Court are attached hereto.

4. **Objections to the Settlement.** The original postmarked deadline for Settlement Class Members to object to the Settlement was February 15, 2017. The postmarked deadline for Settlement Class Members that were part of the Supplemental Notice Program to object to the Settlement was June 14, 2017. Under the Agreement, objections need not be sent to the Settlement Administrator, but rather must be filed with the Court, with a copy to Class Counsel and Defendants' counsel. As of the date of the declaration executed by Eric Robin on March 22, 2017 (Dkt. No 82), KCC had received no objections to the Settlement, but was aware that one (1) objection had been filed with the Court, with a copy to Class Counsel and Defendants' counsel. KCC is not aware of any new objections being filed since then.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct to the best of my knowledge. Executed on this 23 day of August 2017 at San Rafael, California.



Jonathan D. Carameros

KCC Class Action Services
Gao v. JPMorgan Chase & Co.
Exhibit C: Exclusion Report

Count

7

ClaimID	Last Name	First Name	Timeliness
10003526701	ATWAL	ANITA B	TIMELY
10010187201	DARR	ALEXANDER J	LATE
10011785501	EDELMAN	MENACHEM M	TIMELY
10012583901	FADHIL	AQEEL	TIMELY
10015686101	GRYKA	ROBERT M	TIMELY
10038894201	SCHAPIRO	SHNEUIR	TIMELY
10038895401	SCHAPIRO	SHOSHANA	TIMELY

1-3-17

TO: SETTLEMENT ADMINISTRATOR
FM: ANITA ATWAL



RE: CLASS ACTION Settlement -
EXCLUSION

PLEASE EXCLUDE ME FROM:
THE SETTLEMENT in bad, et al. v. JP
Morgan Chase & Co., et al., S.D.N.Y., 14
CIV. 4281

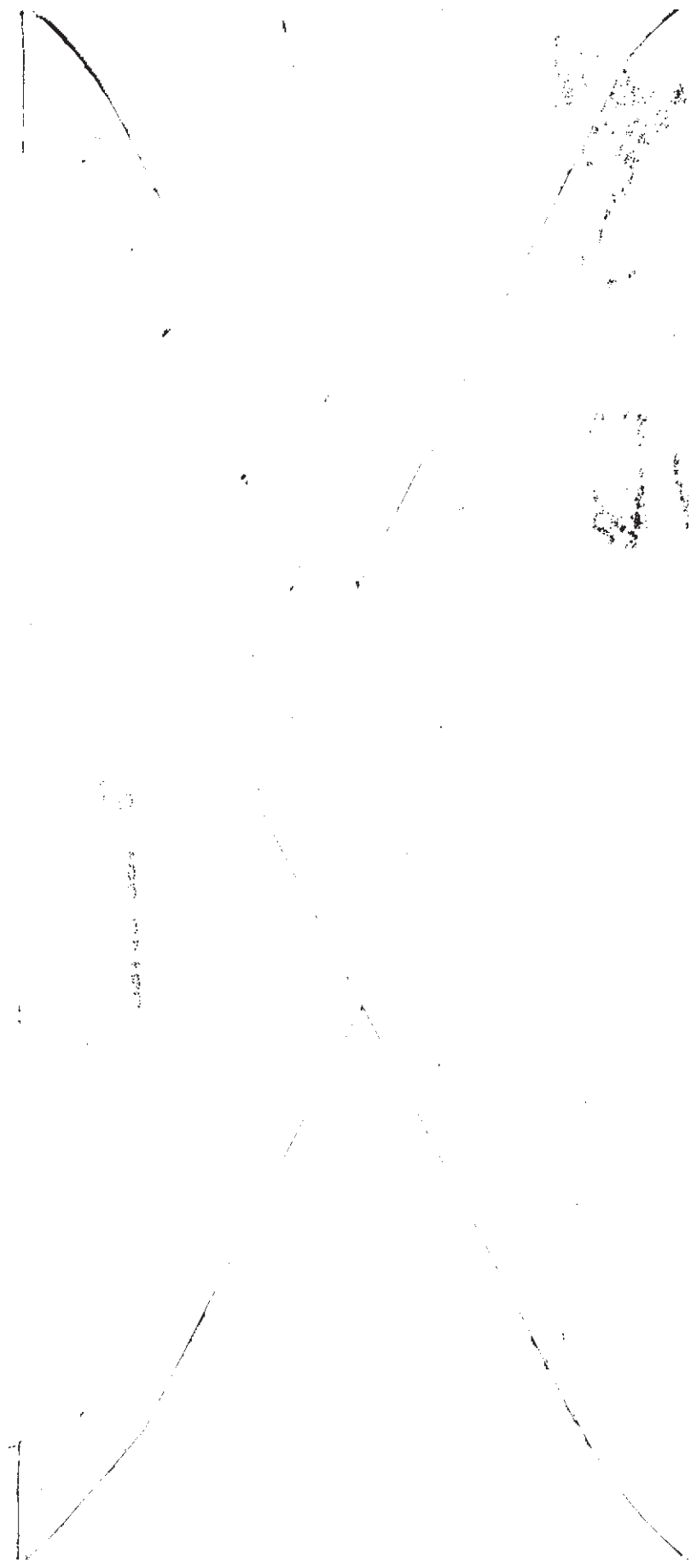
Anita Atwal

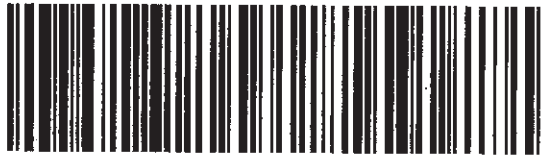


TAMPA, FL 335
SAINT PETERSBURG FL
03 JUN 2017 PM 3 L

Chase Rewards Program Settlement
P.O. Box 43428
PROVIDENCE, R.I. 02940-3428

02540-342828





PRESORTED
FIRST-CLASS MAIL
POSTAGE AND FEES PAID
C2M LLC
22202

Address Service Requested

9214 8901 3247 3400 0457 6032 33

1*****SNGLP 480

Chase Rewards Program Settlement
PO Box 43428
Providence, RI 02940-3428



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Alexander Darr



Chase Rewards Program Settlement
PO Box 43428
Providence, RI 02940-3428

Claim# JGA-10010187201-10262

Please opt me out of the class action settlement. My previous letter sent to this address was returned as undeliverable. I have confirmed the address was correct, and it was. As such, I'm sending this follow-up request by certified mail.

If you have any questions, please do not hesitate to contact me.

Regards,

Alex Darr

A Settlement Agreement has been reached with JPMorgan Chase & Co. ("JPMC") and Chase Bank USA, N.A. ("CBUSA," and collectively with JPMC, "Chase") in a lawsuit where the Plaintiffs allege that Chase violated state common and statutory law when Chase forfeited rewards points upon CBUSA's closure of credit-card accounts. The lawsuit, Gao, et al. v. JPMorgan Chase & Co., et al., is pending in the United States District Court for the Southern District of New York. Chase denies any liability or wrongdoing. To settle the case and avoid the costs and risks of litigation, Chase has agreed to provide a Settlement Fund of \$2,085,000. To see a more detailed notice, full information on the Settlement, the Settlement Agreement, and other documents in the case, please visit the website: www.chaserewardsprogramsettlement.com.

Why am I being contacted? CBUSA's records indicate that you may be a Settlement Class Member because Chase forfeited your rewards points after closing your credit-card account for certain reasons, and you may not have been given the opportunity to redeem those points after the closure of your account.

Number of Forfeited Points: 15473.00

What can I get from the settlement? If the Court approves the Settlement, Settlement Class Members who submit a valid Claim Form will receive a cash distribution from the Settlement Fund based on the number of points Chase forfeited when their accounts were closed and the amount of the Settlement Fund after payment of certain amounts. Specifically, the Settlement Fund will be used to pay attorneys' fees and costs, costs of notice and administration of the Settlement, and a service payment to the two named Plaintiffs (the "Class Representatives"). Class Counsel will seek up to one third of the \$2,085,000 fund as their fee and up to \$75,000 for their costs. Class Counsel will also request that a payment of up to \$7,500 each be paid from the Settlement Fund to the two Class Representatives for their service in bringing this lawsuit.

How do I get my payment? To make a claim, you must complete and mail the attached Claim Form by March 17, 2017. Claims may also be submitted online at www.chaserewardsprogramsettlement.com; or you may download a form from the same website and mail it to the Settlement Administrator. For help filing a claim, call 1-855-306-9709.

What are my other options? If you don't want to be legally bound by the Settlement, you must exclude yourself from the Settlement by February 15, 2017. Unless you exclude yourself, you will be bound by the terms of the Settlement Agreement, including, but not limited to, its Releases. If you do not exclude yourself, you may object to the Settlement and/or the amount of expenses incurred in obtaining the Settlement, including attorneys' fees. If you object to the Settlement, you must sign your objection yourself and file it with the Court. If you file a timely objection, you may appear at the hearing the Court holds to finally approve the Settlement, but you are not required to attend. You may also hire your own lawyer at your own expense to pursue an objection. Objections are due by February 15, 2017. If you object, please refer to the Settlement Agreement posted on the website www.chaserewardsprogramsettlement.com for more information on the requirements for objecting and for verifying your status as a Settlement Class Member. If your objection is rejected by the Court, you will be bound by the terms of the Settlement.

When will the hearing be held to determine approval of the settlement, and where? The Court will hold a Final Approval Hearing on April 6, 2017 at 11:00 a.m. at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007 to decide whether to approve: (1) the Settlement, (2) Class Counsel's request for attorneys' fees of up to one third of the Settlement Fund and expenses of up to \$75,000, and (3) up to \$7,500 each for a service payment to the Class Representatives.

Who are the lawyers for the class? The Court has appointed Golomb & Honik, P.C. and Trief & Oik as Class Counsel.

JGA



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 1810 PROVIDENCE, RI

POSTAGE WILL BE PAID BY ADDRESSEE

CHASE REWARDS PROGRAM SETTLEMENT
P.O. BOX 43428
PROVIDENCE RI 02940-9903



**Official Notice of Proposed
Class Action Settlement
and Final Approval Hearing**

Chase Rewards
Program Settlement
P.O. Box 43428
Providence, RI 02940-3428



You have been identified as a potential member of a class of persons who forfeited rewards points upon Chase Bank USA, N.A.'s closure of your credit-card account, and who were not given the opportunity to redeem those points after the account was closed.



Postal Service: Please do not mark barcode

0042001**P0002-S0087-B0001****AUTO**ALL FOR AADC 460

Claim#: JGA-10010187201-10262

Alexander J Darr



A federal court authorized this notice.

This is not a solicitation from a lawyer.

This is not notice of a lawsuit against you.

File your Claim by March 17, 2017 using the attached Claim Form or online at www.chaserewardsprogramsettlement.com

JGA



10010187201

Chase Rewards Program Settlement Claim Form

By submitting this Claim, I request a Settlement Fund Payment and certify as provided below.

Address for Settlement Fund Payment (if different from where this notice was sent)

Name: _____

Address: _____

City, State: _____

Zip Code: _____

I hereby certify that I was not given the opportunity to redeem my forfeited points after the closure of my Chase Bank USA, N.A. credit-card account(s).

Signature: _____

Date (mm/dd/yyyy): _____

Print Name: _____

CERTIFIED MAIL

CERTIFIED MAIL

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JCH
MAR 07 2017
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0003186699
MAILED FROM ZIP CODE 48506

UNITED STATES POSTAGE
PITNEY BOWES
\$ 003.81⁰
MAR 01 2017
MAILED FROM ZIP CODE 48506

USPS CERTIFIED MAIL™



9214 8901 3247 3400 0457 6032 33

124471-1-1
Alexander Dairr

Address Service Requested

1.....SINGLP 480

Via Certified Mail-Return Receipt

January 16, 2017

Menachem Edelman
[REDACTED]

Chase Rewards Program Settlement
P.O. Box 43428
Providence, RI 02940-3428

RE: Opt-out of Gao, et al. v. JPMorgan Chase & Co., et al., S.D.N.Y., No. 14 Civ. 4281

Claim # 10011785501

Dear Settlement Administrator:

My name is Menachem Edelman and my address is [REDACTED]
[REDACTED] **I wish to be excluded from any settlement reached in the above-referenced case.** Please consider this my opting out of the class-action settlement as I do not wish to be bound by its terms.

Sincerely,


Menachem Edelman

M. ZILMAN



DELIVERED
FEB 20 2017

PRIME
FIRST CLASS
PERMIT NO. 1000
LAUDERHILL, FL 33099



U.S. POSTAGE
PAID
LAUDERHILL, FL
33099
FEB 15 17
AMOUNT
\$3.84
R2304H109863-04

102940

10100

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



7016 2710 0000 6329 447J

Chase Rewards Program Section
PO Box 43428
Providence, RI 02940

02940-342828



My name: Aqeel Fadhil

My address:



Claim # JGA-10012583901-931

I do not want to be legally bound by Settlement, I want to exclude myself from the Settlement.

Aqeel Fadhil 

AQEEL FADHIL

OMAHA, NE 68103

03 FEB 2017 PM 1 L

①
Chase Rewards
Program Settlement
P.O. Box 43428
Providence, RI 02940-3428

02940-342828



Chase Rewards Program Settlement

P.O. Box 43428

Providence, RI 02940-3428

RE: Exclusion From *Settlement in Gao, et al. v. JPMorgan Chase & Co., et al.*,

Name: Robert M Gryka

Claim #: JGA-10015686101-15778

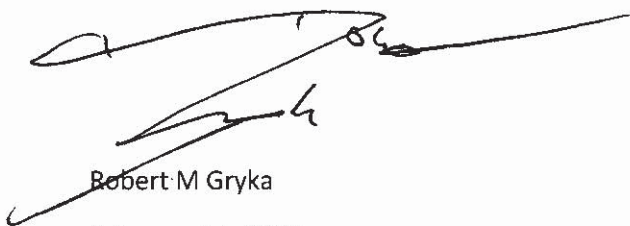
Old Address: [REDACTED]

New Address: [REDACTED]

Declaration:

I want to be excluded from the Settlement in *Gao, et al. v. JPMorgan Chase & Co., et al.*, S.D.N.Y., 14 Civ. 4281

Signature:

A handwritten signature in black ink, appearing to be 'Robert M Gryka', written over a horizontal line.

Robert M Gryka

February 14, 2017

R M Gryka

20

CHASE REWARDS SETTLEMENT
P.O. Box 43428
Providence, RI 02940-3428

USA

RECEIVED
MAR 01 2017

BY:

JERUSALEM
0153992
15/02/2017 17:12
Postage
0.025



029403428 B059

Copy Via Certified Mail-Return Receipt

February 10, 2017

Schneur (Shneuir) Schapiro
[REDACTED]

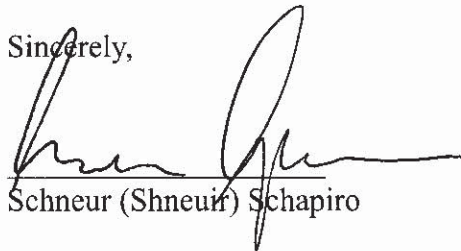
Chase Rewards Program Settlement
P.O. Box 43428
Providence, RI 02940-3428

RE: Opt-out of Gao, et al. v. JPMorgan Chase & Co., et al., S.D.N.Y., No. 14 Civ. 4281
Claim #JGA-10038894201-39191

Dear Settlement Administrator:

My name is Schneur (Shneuir) Schapiro and my address is [REDACTED]
[REDACTED] **I wish to be excluded from any settlement reached in the above-referenced case.**
Please consider this my opting out of the class-action settlement as I do not wish to be bound by its terms.

Sincerely,


Schneur (Shneuir) Schapiro

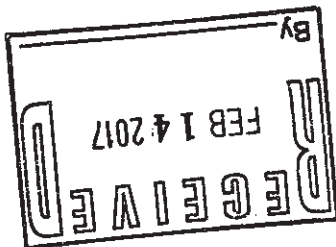
Schneer, Stephen

MIAMI FL 331

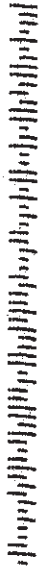
10 FEB 2017 PM 4 L



Chase Rewards Program Section
P.O. Box 43429
PROVIDENCE, RI 02940-3429



02940-342929



Copy Via Certified Mail-Return Receipt

February 10, 2017

Shoshana Schapiro
[REDACTED]

Chase Rewards Program Settlement
P.O. Box 43428
Providence, RI 02940-3428

RE: Opt-out of Gao, et al. v. JPMorgan Chase & Co., et al., S.D.N.Y., No. 14 Civ. 4281
Claim #JGA-10038895401-39192

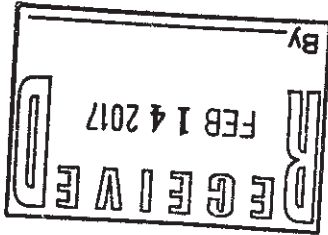
Dear Settlement Administrator:

My name is Shoshana Schapiro and my address is [REDACTED]
[REDACTED] **I wish to be excluded from any settlement reached in the above-referenced case.** Please consider this my opting out of the class-action settlement as I do not wish to be bound by its terms.

Sincerely,


Shoshana Schapiro

Shoshana Schneider



Chase Rewards program statements
P.O. Box 43428
PROVIDENCE, RI 02940-3428

3

02940-342828

